

ORIGINAL

Approved: Juliana Murray
JULIANA MURRAY
Assistant United States Attorney

Before: HONORABLE ONA T. WANG
United States Magistrate Judge
Southern District of New York

19MAG . 4452

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UNITED STATES OF AMERICA : COMPLAINT
:
- v. - : Violations of 21 U.S.C.
: §§ 841 and 846, and 18
: U.S.C. § 2
RUDOLF LANDMAN, :
a/k/a "Eric Kiser," : COUNTY OF OFFENSE:
: NEW YORK
Defendant. :
- - - - - X

SOUTHERN DISTRICT OF NEW YORK, ss.:

THOMAS JACQUES, being duly sworn, deposes and says that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), and charges as follows:

COUNT ONE

(Attempt to Distribute Narcotics)

1. On or about May 7, 2019, in the Southern District of New York and elsewhere, RUDOLF LANDMAN, a/k/a "Eric Kiser," the defendant, intentionally and knowingly did attempt to distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. The controlled substance involved in the offense was a quantity of mixtures and substances containing a detectable amount of 3,4-Methylenedioxymethamphetamine ("MDMA"), in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846; Title 18, United States Code, Section 2.)

COUNT TWO
(Narcotics Conspiracy)

3. In or about May 2019, in the Southern District of New York and elsewhere, RUDOLF LANDMAN, a/k/a "Eric Kiser," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

4. It was a part and object of the conspiracy that RUDOLF LANDMAN, a/k/a "Eric Kiser," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

5. The controlled substance that RUDOLF LANDMAN, a/k/a "Eric Kiser," the defendant, conspired to distribute and possess with intent to distribute was a quantity of mixtures and substances containing a detectable amount of MDMA, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

6. I am a Special Agent with HSI. I have been personally involved in the investigation of this matter. This Affidavit is based upon my personal participation in the investigation, my examination of reports and records, and my conversations with other law enforcement agents and other individuals. Because this Affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

7. Based on my participation in this investigation, I have learned, among other things, the following:

a. On or about April 29, 2019, during an enforcement examination of mail arriving at the John F. Kennedy Airport Mail Branch from Belgium, law enforcement officers identified a suspicious package ("Package-1"). The package was

addressed to "Landman Capital Group Attn: Eric Kiser," at a certain building in Manhattan ("Building-1").

b. Law enforcement officers examined Package-1 and found triangular pills bearing the word "Tesla," which were concealed inside fish food containers within Package-1. The pills, which weighed approximately 4.941 kilograms, field-tested positive for the presence of MDMA. Law enforcement replaced the MDMA in Package-1 with sham pills and re-sealed Package-1.

c. On or about May 1, 2019, law enforcement spoke with the superintendent (the "Super") at Building-1, who stated, in substance and in part, that RUDOLF LANDMAN, a/k/a "Eric Kiser," the defendant, received mail at Building-1.

8. Based on my participation in this investigation, and my conversations with other law enforcement officers who have participated in this investigation, I am aware that the following occurred on May 7, 2019, among other things:

a. I and other law enforcement officers performed a controlled delivery of Package-1, which contained the sham pills, to the Super at Building-1. We then conducted surveillance of Building-1.

b. Shortly after delivering Package-1 to Building-1, I and other law enforcement officers observed an individual subsequently identified as RUDOLF LANDMAN, a/k/a "Eric Kiser," the defendant, enter Building-1 and retrieve Package-1.

c. I and other law enforcement officers then entered Building-1. LANDMAN observed us entering and attempted to flee through the basement of Building-1. LANDMAN was subsequently apprehended and arrested.

d. LANDMAN was then advised of his *Miranda* rights. He waived those rights both verbally and in writing and agreed to speak with law enforcement officers. LANDMAN stated the following, in substance and in part:

i. A co-conspirator not named as a defendant herein ("CC-1") had directed LANDMAN to provide a name and delivery address for Package-1 and to accept delivery of Package-1. LANDMAN gave CC-1 a false company name (*i.e.* "Landman Capital Group"), his alias (*i.e.*, "Eric Kiser"), and the address of Building-1.

ii. On or about May 7, 2019, LANDMAN received notification that Package-1 had been delivered to Building-1.

iii. LANDMAN has received packages for CC-1 in the past. On at least one prior occasion, LANDMAN saw CC-1 open a package and observed drugs inside the package.

iv. LANDMAN uses ketamine, and had used it at some point before retrieving Package-1 on or about May 7, 2019.

v. LANDMAN believed Package-1 contained drugs.

WHEREFORE, I respectfully request that RUDOLF LANDMAN, a/k/a "Eric Kiser," the defendant, be imprisoned or bailed, as the case may be.



Special Agent Thomas Jacques
Homeland Security Investigations

Sworn to before me this
8th day of May, 2019



THE HONORABLE ONA T. WANG
United States Magistrate Judge
Southern District of New York